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8 Attorneys for Plaintiffs
INLAND CONCRETE ENTERPRISES, INC. and
INLAND CONCRETE ENTERPRISES, INC.
9 EMPLOYEE STOCK OWNERSHIP PLAN and
NICHOLAS L. SAAKVITNE, as TRUSTEE
10 OF THE INLAND CONCRETE ENTERPRISES, INC.
EMPLOYEE STOCK OWNERSHIP PLAN

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13

14 INLAND CONCRETE ENTERPRISES,
INC. EMPLOYEE STOCK OWNERSHIP
15 PLAN; NICHOLAS L. SAAKVITNE, as
TRUSTEE OF THE INLAND
16 CONCRETE ENTERPRISES, INC.
EMPLOYEE STOCK OWNERSHIP
17 PLAN; AND INLAND CONCRETE
ENTERPRISES, INC., a California
18 corporation,

19 Plaintiffs,

20 vs.

21 KRAFT AMERICAS, LP., a Limited
Partnership; RUNE KRAFT, an
22 individual; and Does 1 through 5,
inclusive,

23 Defendants.
24

CASE NO.: CV10 1776 VBF (OPx)

Honorable Oswald Parada

[DISCOVERY MATTER]

**ORDER RE
PROTECTIVE ORDER**

Action Filed: March 11, 2010
Trial Date: May 24, 2011

25
26 The Court having reviewed the Protective Order (the "Protective
27 Order") filed on February 18, 2011 by Plaintiffs Inland Concrete Enterprises, Inc.
28 Employee Stock Ownership Plan and Inland Concrete Enterprises, Inc., a California

1 corporation, and Plaintiff Nicholas L. Saakvitne, as Trustee of the Inland Concrete
2 Enterprises, Inc. Employee Stock Ownership Plan, through their attorneys of record,
3 Michael A. Vanic and Ryan R. Salsig of Reish & Reicher, and good cause appearing
4 therefor:

5
6 IT IS ORDERED THAT the terms of the Protective Order as set forth in
7 paragraphs 2 through 14, inclusive, thereof shall be, and hereby are, approved and
8 entered as the Protective Order of the Court and that they shall be, and hereby are,
9 binding upon all of the parties in this action and upon all subsequent signatories to
10 the Acknowledgement Of Receipt Of Protective Order Regarding Confidential
11 Information And Agreement To Be Bound Thereby, in the form attached as Exhibit
12 "A" hereto.

13
14 Dated: 2/25/11



Hon. Oswald Parada
United States Magistrate Judge

Exhibit "A"

**ACKNOWLEDGEMENT OF RECEIPT OF STIPULATION
FOR PROTECTIVE ORDER AND PROTECTIVE ORDER
REGARDING CONFIDENTIAL INFORMATION AND
AGREEMENT TO BE BOUND THEREBY**

I hereby acknowledge receipt of and I have read a copy of Protective Order in the action entitled Inland Concrete Enterprises Inc. Employee Stock Ownership Plan, et al. v. Kraft Americas, LP, etc., et al., United States District Court Case No. CV10 1779 VBF (OPx). I understand that Confidential Information, as that term is defined in the Order, will or may be disclosed to me. I understand that said Confidential Information is being provided to me pursuant to the provisions of the Protective Order. I agree that I will be bound by the provisions of the Protective Order with respect to any Confidential Information provided to me. I agree to abide by the Protective Order and not to reveal or otherwise communicate to anyone or utilize any of the information designated "Confidential" that is disclosed to me except in accordance with the terms of the Protective Order. I also agree to return all Confidential Information to the party who has delivered said Confidential Information to me within the time period set forth in paragraph 7 of the Order. I further understand that if I fail to comply with the terms of the Order, I may be subject to sanctions by the Court, and I hereby consent to personal jurisdiction in the State of California with respect to any matter relating to, or arising out of, the Order.

Executed this ____ day of _____, 2010 at _____.

[Name]